

DEPARTMENT OF HUMAN RESOURCES FAMILY INVESTMENT ADMINISTRATION	FOOD SUPPLEMENT PROGRAM MANUAL	
VERIFICATION	Section 408	Page 1

408.1 Purpose

This section provides the general policy regarding all verification. It describes the kinds of information that must be verified at application, recertification and interim change. It also provides a definition of documentary evidence and collateral contacts, and details the household's and local department's responsibility in the verification process. It does not provide details regarding the verification of specific eligibility factors. This information is in the section on each specific eligibility factor.

408.2 Definition

Verification is the use of documentation or third party information to establish the accuracy of statements on the application. The local department will provide the household with written notice of the required verifications. The household has the primary responsibility for providing written documentation to support statements on the application. The household is also responsible for resolving any questionable information.

408.3 Mandatory Verification at Application (Normal Processing)

- A. Verify the following information prior to certification for households initially applying. Do not verify the factors listed in section 408.12 for those households with categorical eligibility:

1. Gross, non-exempt income;
2. Social Security Number (verify once, SS card is not necessary);
3. Medical expenses, including reimbursed amounts, if the household claims allowable medical expenses above \$35 per month. (This is considered an optional verification because obtaining the information does not affect the eligibility decision. However, if the household claims medical expenses it is mandatory to verify the expenses in order to allow the deduction;
4. Utility expenses, if:
 - (a) Entitlement to a utility standard is questionable
 - (b) If not entitled to claim a utility standard but has a single utility expense
 - (c) The household wishes to claim utility expenses for an unoccupied home. Note: The agency must verify the actual utilities for an unoccupied home and cannot use the utility allowances.
5. Amount of non-excluded resources;



DEPARTMENT OF HUMAN RESOURCES FAMILY INVESTMENT ADMINISTRATION	FOOD SUPPLEMENT PROGRAM MANUAL	
VERIFICATION	Section 408	Page 2

408.3 Mandatory Verification at Application (Normal Processing)



6. Residency (except in the case of homelessness, households newly arrived in the project area and some migrant farm workers);
7. Identity;
8. Household composition, if questionable;
9. Immigration status for applicant non-citizens; (for further clarification see Sec 120.14, Immigrants, of this manual)
10. Legal obligation to make child support payments to or for an individual living outside the household and the amount of the actual payment.
11. Disability when necessary for other eligibility determinations (e.g. eligibility for uncapped shelter, medical expenses, student status or exemption from work registration);
12. Shelter costs for a homeless household if it claims shelter expenses that would result in a shelter deduction in excess of the homeless shelter allowance of \$143;
13. Hours worked by an ABAWD and countable months in another state if applicable.

NOTE: It is not intended that the verification of residency and identity in the regular application process result in a change in procedure or need for additional verification. Documents used to verify other factors of eligibility normally suffice to confirm residency and identity.

- B. Verification of residency may be impossible to obtain in certain situations. Some households, such as migrant farm workers and the homeless, may find it impossible to provide documentary proof of residency.
- C. If it proves impossible to verify residency, certify the household for Food Supplement Program (FSP) benefits if otherwise eligible. In addition, no specific document is required to verify residency.

DEPARTMENT OF HUMAN RESOURCES FAMILY INVESTMENT ADMINISTRATION	FOOD SUPPLEMENT PROGRAM MANUAL	
VERIFICATION	Section 408	Page 3

408.4 Mandatory Verification at Application (Expedited Processing)

Identity is a mandatory verification when processing an application for expedited service. In these instances, the local department must:

- A. Verify the identity of the applicant in all cases through a collateral contact or other readily available documentary evidence.
- B. Make all reasonable efforts to verify the household's residency, income, liquid resources and other factors of eligibility within the expedited processing time frames.
- C. Do not delay certification beyond the expedited processing timeframes if eligibility criteria other than identity cannot be verified.

408.5 Verification of Questionable Information

- A. Local departments must verify all other factors of eligibility if they are questionable and affect the household's eligibility or benefit level.
- B. To be considered questionable, the information on the application must be:
 - 1. Inconsistent with statements made by the applicant; or
 - 2. Inconsistent with other information on the application or on previous applications; or
 - 3. Inconsistent with information received by the local department.
- C. Evaluate each household on the basis of its individual circumstances when determining if information is questionable.

EXAMPLE: A household's report of expenses that exceed its income may be grounds for the local department's request for further verification. This circumstance, in itself, is not grounds for a denial of benefits. In this instance, explore with the household how it meets its expenses. Request further verification based on the household's response to these questions.

DEPARTMENT OF HUMAN RESOURCES FAMILY INVESTMENT ADMINISTRATION	FOOD SUPPLEMENT PROGRAM MANUAL	
VERIFICATION	Section 408	Page 4

408.6 Optional Verification

408.61 Optional Verification Requirements

- A. Local departments that request optional verifications must request them from **all** households within the project area.
- B. Do not apply a standard that prescribes variances in verification based on race, religion, national origin, or ethnic background.
- C. Do not target groups such as migrant workers for more intensive verification requirements than other households.

408.62 Types of Optional Verification

Local departments may elect to mandate verification of any other factors of eligibility or allotment level. Local department plans must identify the types of verification they elect to require. Obtaining optional verifications does not affect the eligibility determination but may affect the FSP benefit amount. Households can be certified without optional verification information. Examples of optional verification include the following:

A. Continuing Shelter Charges

The local department may verify those shelter expenses specified in Section 212. 9 (Excess Shelter Deduction), other than utilities, if allowing the expense could potentially result in a deduction.

B. Utility Expenses

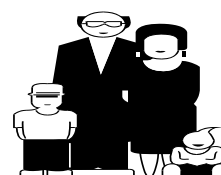
- 1. The local department may verify that a household actually incurs a utility expense, providing the household is entitled to claim a utility allowance.
- 2. It is not necessary to verify the amount of the expense.
- 3. Do not verify more than one utility unless questionable.

C. Dependent Care Costs

The local department may verify that a household actually incurs the cost and the actual amount of the cost, if allowing the expense could potentially result in a deduction.

D. Household Size

The local department may verify the household size. It is not necessary to verify household composition factors such as boarder status or whether a group of individuals purchases and prepares its meals together unless questionable.



DEPARTMENT OF HUMAN RESOURCES FAMILY INVESTMENT ADMINISTRATION	FOOD SUPPLEMENT PROGRAM MANUAL	
VERIFICATION	Section 408	Page 5

408.63 Optional Verification Provisions

- A. If obtaining an optional verification including medical expenses could/would delay the household's certification, advise the household that its eligibility and FSP benefit level may be determined without providing a deduction for the unverified expense. However, the use of the optional verification may increase the allotment amount.
- B. Compute shelter costs without including the unverified elements. Use the Standard or Limited Utility Allowance if the household is entitled to claim it and does not verify higher actual costs.
- C. Determine the household's eligibility and FSP benefit level without providing a deduction for the unverified expense if the expense cannot be verified.
- D. If the household subsequently provides the missing verification, redetermine the household's benefits in accordance with the timeliness standards in Section 420 (Reporting Changes) of this manual.
- E. The household is entitled to the restoration of FSP benefits (retroactive to the month of application) only if the expense could not be verified within the 30-day processing standard because the local department failed to allow the household sufficient time (see Section 406, Normal Processing) to verify the expense.
- F. Process the household's application as provided in Section 406 if the household is ineligible because the expense is disallowed.

408.7 Verification at Recertification

Re-verify the following information at recertification:

- A. Gross non-exempt income if the source has changed or the amount has changed by more than \$50;
- B. Previously unreported and total recurring medical expenses which have changed by more than \$25;
- C. Actual utility expenses which have changed by more than \$25;
- D. Newly obtained Social Security Number (changes in Social Security Numbers previously verified must be re-verified);
- E. Changes in legal obligation to pay child support, the obligated amount and the actual amount paid to a non-household member;

DEPARTMENT OF HUMAN RESOURCES FAMILY INVESTMENT ADMINISTRATION	FOOD SUPPLEMENT PROGRAM MANUAL	
VERIFICATION	Section 408	Page 6

408.7 Verification at Recertification (continued)

- F. Changes in immigrant status;
- G. Work hours for ABAWDS;
- H. Changes in residency; and
- I. Changes in household composition, if questionable.

Note: Re-verify other information, including resources, if it is incomplete, inaccurate, inconsistent or outdated.

408.8 Verification at Interim Change

The same verification requirements that apply at initial application apply to changes reported during the certification period with the following exceptions:

- A. Do not verify changes in earned income if the source has not changed and the amount has changed by \$50 or less, unless the information is incomplete, inaccurate, inconsistent or outdated.
- B. Do not verify changes in utility expenses if the source has not changed or the amount has changed by \$25 or less, unless the information is incomplete, inaccurate, inconsistent or outdated.
- C. Do not verify changes in medical expenses if the source has not changed or the amount has changed by \$25 or less, unless the information is incomplete, inaccurate, inconsistent or outdated.
- D. Verification is not required until the next recertification if a change results in a decrease in FSP benefits.

408.9 Types of Verifications

408.91 Documentary Evidence

- A. Documentary evidence consists of a written confirmation of a household's circumstances. Some examples of documentary evidence include the following:
 - 1. Wage stubs
 - 2. Copies of checks
 - 3. Award letters
 - 4. Utility bills
 - 5. Bank statements

DEPARTMENT OF HUMAN RESOURCES FAMILY INVESTMENT ADMINISTRATION	FOOD SUPPLEMENT PROGRAM MANUAL	
VERIFICATION	Section 408	Page 7

408.91 Documentary Evidence (continued)

6. Letters from employers, landlords, etc.
 7. Immigration and Naturalization documents and SAVE
- B. The **household is responsible** for providing documentary evidence to support its statements. Households may supply documentary evidence in person, through the mail, by facsimile (fax) or other electronic device or through an authorized representative. The local department **cannot require** the household to present the documentation in person.
- C. The case manager must accept any reasonable documentary evidence as long as it provides adequate verification of the statements provided by the household. Local departments must attempt to assist the household with obtaining documentary evidence if it is difficult or impossible for the household to obtain them on its own.
- D. The case manager must be primarily concerned with whether the verification proves the statements on the application. Simply because a household is in an error-prone situation does not mean there is insufficient verification to prove household member statements.

Reminder: Do not close or deny a FSP benefit case because the household does not provide verification of expenses such as dependent care, medical or shelter costs. Certify the household without the deduction.

408.92 Collateral Contact

- A. A collateral contact is a verbal confirmation of a household's circumstances. The collateral contact may be made in person or by telephone. Some examples of acceptable collateral contacts include the following:
1. Employers
 2. Landlords
 3. Social service agencies
 4. Neighbors of the household
- B. Substitute a collateral contact or home visit when unable to obtain documentary evidence.
1. Home visits **must be scheduled in advance**; and
 2. **May only be used** when there is not enough documentary evidence to make a firm determination of eligibility or benefit level.



DEPARTMENT OF HUMAN RESOURCES FAMILY INVESTMENT ADMINISTRATION	FOOD SUPPLEMENT PROGRAM MANUAL	
VERIFICATION	Section 408	Page 8

408.92 Collateral Contact (continued)

- C. The household is responsible for providing the name of the collateral contact. It may request the local department's assistance in designating the collateral contact.
- D. The case manager must remember to have the customer sign **Consent for the Release of Information before requesting verification from a collateral contact.**
- E. The local department is not required to use the collateral contact named by the household if it cannot be expected to provide accurate third party verification. When this occurs, the local department must request the household to name another collateral contact. The local department is responsible for obtaining verification from acceptable collateral contacts.

Note: Disclose only the information (regarding the customer) that is necessary to obtain the required verification.
Do not disclose information the household has supplied.
Do not disclose that the household has applied for FSP benefits.
Do not suggest the household has done anything wrong.

408.10 Discrepancies

Local departments must give households a reasonable opportunity to resolve discrepancies prior to eligibility determination when information from another source contradicts statements made by the household.

408.11 Narration

Case records must be narrated to support eligibility, ineligibility, and FSP benefit level determination. Narration must be in sufficient detail to allow a supervisor or reviewer to determine the reasonableness and accuracy of the determination. The narration must also include any additional information regarding the applicant/recipient that is pertinent to the eligibility process.

Some examples of narration include the following:

- A. The reason for the withdrawal of an application, if any was stated by the household, and the withdrawal was confirmed;
- B. Details regarding refusal to cooperate;
- C. The reason a request for a waiver of the office interview is granted or denied;



DEPARTMENT OF HUMAN RESOURCES FAMILY INVESTMENT ADMINISTRATION	FOOD SUPPLEMENT PROGRAM MANUAL	
VERIFICATION	Section 408	Page 9

408.11 Narration (continued)

- D. The reason information is considered questionable and the verification that was used to resolve the questionable situation;
- E. The reason an alternative source of verification (a collateral contact or home visit) was considered necessary;
- F. The reason a collateral contact was rejected and an alternate requested;
- G. A statement that the decision to average fluctuating income was made by the household;
- H. A statement that the decision to use a utility allowance or actual costs for these items was made by the household;
- I. A statement that income and/or resources was not verified because the household stated that it did not have any, and there was no reason to question its statement.

408.12 Public Assistance (PA) and Supplemental Security Income (SSI) Households

- A. Local departments will accept, without further verification, eligibility factors for the following when a household is categorically eligible as defined in Section 115, Categorical Eligibility, of this manual:
 - 1. Resources;
 - 2. Gross and net income limits;
 - 3. Social security number information;
 - 4. Sponsored alien information; and
 - 5. Residency.
- B. If any of the following factors are questionable, verify that the household:
 - 1. Contains only members that are PA or SSI recipients;
 - 2. Meets the household definition defined in Section 100, Household composition, of this manual;
 - 3. Includes all persons who purchase and prepare food together, regardless of whether they are separate units for PA or SSI purposes; and

DEPARTMENT OF HUMAN RESOURCES FAMILY INVESTMENT ADMINISTRATION	FOOD SUPPLEMENT PROGRAM MANUAL	
VERIFICATION	Section 408	Page 10

408.12 Public Assistance (PA) and Supplemental Security Income (SSI) Households (continued)

- 4. Includes no persons who are disqualified as described in Section 115 of this manual.
- C. Verify factors relating to eligibility determination that are not verified for PA or SSI purposes if required in this section.